

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x
UNITED STATES OF AMERICA :
:
- v. - :
:
BRANDON MARTIN, and :
TAMEKA LINDO, :
:
Defendants. :
- - - - - x

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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INFORMATION

19 Cr. __ ()

19 CRIM 240

COUNT ONE
(Money Laundering Conspiracy)

The United States Attorney charges:

1. From at least in or about 2014, up to and including in or about July 2018, in the Southern District of New York and elsewhere, BRANDON MARTIN and TAMEKA LINDO, the defendants, and others known and unknown, willfully and knowingly, did combine, conspire, confederate, and agree, together and with each other, to violate Title 18, United States Code, Section 1956(a)(1)(A)(i).

2. It was a part and an object of the conspiracy that BRANDON MARTIN and TAMEKA LINDO, the defendants, and others known and unknown, in an offense affecting interstate and foreign commerce, knowing that the property involved in a financial transaction represented the proceeds of some form of illegal activity, did conduct and attempt to conduct such a financial transaction, which in fact involved the proceeds of specified unlawful activity, to wit, violations of the Travel Act, with the intent to promote the carrying on of specified unlawful activity,

JUDGE BRODERICK

in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

(Title 18, United States Code, Section 1956(h).)

FORFEITURE ALLEGATIONS

3. As a result of committing the offense alleged in Count One of this Information, BRANDON MARTIN and TAMEKA LINDO, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in said offense, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offense and the following specific property:

a. Any And All Monies And Funds Previously On Deposit At BB&T Bank In Account No. 242237668, Held In The Name Of Flawless Referrals Ent Inc., And Any And All Funds Traceable Thereto, Including Accrued Interest;

b. Any And All Monies And Funds Previously On Deposit At Fifth Third Bank In Account No. 7900280772, Held In The Name Of Flawless Referrals Ent Inc, And Any And All Funds Traceable Thereto, Including Accrued Interest;

c. Any And All Monies And Funds Previously Held By Northwestern Mutual Insurance Company In Account No. 22-195-36, Insured In The Name Of Brandon Martin And Naming Tameka Lindo As

Beneficiary, And Any And All Funds Traceable Thereto, Including Interest

d. Any And All Funds Previously On Deposit At TD Bank In Account No. 4312341392, Held In The Name Of Brandon Martin, And Any And All Funds Traceable Thereto, Including Accrued Interest;

e. Any And All Funds Previously On Deposit At TD Bank In Account No. 6753990093, Held In The Name Of Brandon Martin, And Any And All Funds Traceable Thereto, Including Accrued Interest;

f. Any And All Funds Previously On Deposit At TD Bank In Account No. 4326532961, Held In The Name Of Tameka Davian Lindo, And Any And All Funds Traceable Thereto, Including Accrued Interest.

SUBSTITUTE ASSET PROVISION

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third person;

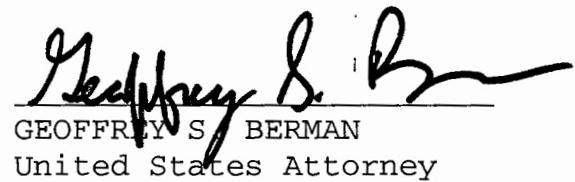
(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)



The image shows a handwritten signature in black ink, appearing to read "Geoffrey S. Berman". Below the signature, there is printed text identifying the signer.

GEOFFREY S. BERMAN
United States Attorney

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(18 U.S.C. § 1956(h))

GEOFFREY S. BERMAN
United States Attorney.
